

Exhibit G

Subject: Re: Kobach
Date: Thursday, October 8, 2020 at 1:06:33 AM Eastern Daylight Time
From: Justin Weddle
To: Sobelman, Robert (USANYS)
CC: Roos, Nicolas (USANYS), Moe, Alison (USANYS), Julia Catania
Attachments: image001.png, image002.png

Dear Rob,

Thank you for this response. Nick Roos and I discussed whom I am representing in this matter on September 1, 2020, and, as far as I understood it, eliminated any ambiguity. I am sorry if there is some confusion. In particular, I told Nick in that conversation that I am representing Kris Kobach and that I have also been asked to represent We Build the Wall, which I do not believe would present any non-waivable conflict. Then, as now, however, given We Build the Wall's inability to access its funds, We Build the Wall is only represented by its general counsel, Kris Kobach.

Mr. Kobach remains willing to comply with a voluntary request. However, given the government's unwillingness to consent to the release of WBTW funds to assist in the processing of that request, Mr. Kobach will need a much greater amount of time, and you will need to understand that the documents are unlikely to be in a database or searchable pdf format.

Justin S. Weddle

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From: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>
Date: Wednesday, October 7, 2020 at 10:35 AM
To: Justin Weddle <jweddle@weddlelaw.com>
Cc: "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>, "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>, Julia Catania <jcatania@weddlelaw.com>
Subject: RE: Kobach

Justin,

The application and affidavit are under seal and were reviewed on an *ex parte* basis. The basis for your request is not clear to us, and the ambiguity around who you are representing also gives us pause in supplying any additional information. We will respond in due course to any application you file with the Court.

On September 3, 2020, you accepted a voluntary document request on behalf of Mr. Kobach, with a request that responsive documents be produced by September 30, 2020. Please let us know when you expect to produce documents responsive to the request. If Mr. Kobach does not intend to respond to the request on a voluntary basis, please let us know if your client would respond to a subpoena seeking the same materials and, if so, whether you would accept service on his behalf.

Thanks,

Rob

From: Justin Weddle <jweddle@weddlelaw.com>

Sent: Tuesday, October 6, 2020 11:22 PM

To: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>

Cc: Roos, Nicolas (USANYS) <nroos@usa.doj.gov>; Moe, Alison (USANYS) <AMoe@usa.doj.gov>; Julia Catania <jcatania@weddlelaw.com>

Subject: Re: Kobach

Dear Robert,

Thank you for this response. Can you please let me know the basis for (1) refusing to produce to me the documents upon which the Court's order is based (even if they are to remain under seal), and (2) requesting that the Court's order and the documents upon which it rests should be sealed.

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From: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>

Date: Tuesday, October 6, 2020 at 8:37 PM

To: Justin Weddle <jweddle@weddlelaw.com>

Cc: "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>, "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>, Julia Catania <jcatania@weddlelaw.com>

Subject: Re: Kobach

Justin,

Until we are able to review your application and understand the basis for your request for relief, we are not able to determine our position.

Thanks,

Rob

On Oct 6, 2020, at 7:52 PM, Justin Weddle <jweddle@weddlelaw.com> wrote:

Thank you for this. Please let me know what the government's position will be on an application to the court for disclosure of these documents to me.

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From: Sobelman, Robert (USANYS) <Robert.Sobelman@usdoj.gov>
Sent: Tuesday, October 6, 2020 6:53:50 PM
To: Justin Weddle <jweddle@weddlelaw.com>; Roos, Nicolas (USANYS) <Nicolas.Roos@usdoj.gov>
Cc: Moe, Alison (USANYS) <Alison.Moe@usdoj.gov>; Julia Catania <jcatania@weddlelaw.com>
Subject: RE: Kobach

Justin,

We will not be providing you a copy of the application and affidavit.

Thanks,

Rob

From: Justin Weddle <jweddle@weddlelaw.com>
Sent: Tuesday, October 6, 2020 5:24 PM
To: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>; Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Cc: Moe, Alison (USANYS) <AMoe@usa.doj.gov>; Julia Catania <jcatania@weddlelaw.com>
Subject: Re: Kobach

Dear Robert,

Thank you for sending the sealed order. I am writing to request that you also send the government's application and supporting affidavit that are referenced in the sealed order. Thank you.

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<image006.png>
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From: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>
Date: Wednesday, September 30, 2020 at 10:53 AM
To: Justin Weddle <jweddle@weddlelaw.com>, "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>
Cc: "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>, Julia Catania <jcatania@weddlelaw.com>
Subject: RE: Kobach

Justin,

We have reviewed your letter.

We respectfully disagree with your characterization of the position taken in our prior email. As I wrote in my prior email, it remains our position that funds raised by We Build the Wall as part of the fraud scheme alleged in the Indictment are crime proceeds. The Indictment alleges that the scheme began in at least December 2018 and was ongoing at the time of the Indictment, which was returned in August 2020. Therefore, our position is that all funds raised by We Build the Wall during that time period are crime proceeds. At the present time, we take no position on whether funds raised by We Build the Wall after the Indictment was unsealed are crime proceeds.

You are incorrect that there is no legal order freezing assets. Please find attached an order issued by Judge Torres on August 24, 2020. Although it was filed under seal, we are providing it to you pursuant to the Court's provision that we may provide a copy to any person in order to facilitate the execution of the order. We request that you treat this document as confidential and do not share it with anyone aside from your client, who should not distribute it further.

Thanks,

Rob

From: Justin Weddle <jweddle@weddlelaw.com>
Sent: Friday, September 25, 2020 3:39 PM
To: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>; Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Cc: Moe, Alison (USANYS) <AMoe@usa.doj.gov>; Julia Catania <jcatania@weddlelaw.com>
Subject: Re: Kobach

Dear all,

Please see the attached letter.

Justin S. Weddle
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<[image007.png](#)>
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From: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>
Date: Wednesday, September 23, 2020 at 12:12 PM
To: "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>, Justin Weddle
<jweddle@weddlelaw.com>
Cc: "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>, Julia Catania
<jcatania@weddlelaw.com>
Subject: RE: Kobach

Justin,

We have reviewed your letter. It remains our position that funds raised by We Build the Wall as part of the fraud scheme alleged in the Indictment are crime proceeds.

On the issue of unpaid vendors, it is our view that they are unpaid creditors and should not receive priority over defrauded victims.

On the issue of legal fees, in order to address the specific points in your letter, we would be grateful if you could please provide the following additional information:

1. Does We Build the Wall, Kobach, or anyone else you're writing on behalf of not have sufficient funds to cover the legal fees described in your letter? Particularly as this question relates to individuals, can you provide us with documents sufficient to show that they do not have sufficient other assets (i.e., assets separate from the funds you identified and which they are seeking to use) to cover the legal fees described in your letter?
2. Please provide legal authority, if you are aware of any, establishing that individuals (such as Kobach and Kolfage) may have a right to have corporate assets, as opposed to personal assets, freed to cover individual legal fees. In addition, with respect to an uncharged individual (such as Kobach), we would be interested in any legal authority establishing that an uncharged officer or employee may have a right to have corporate assets unfrozen to cover his individual legal fees in the course of an investigation.

Thanks,

Rob

From: Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Sent: Tuesday, September 22, 2020 1:24 PM

To: Justin Weddle <jweddle@weddlelaw.com>; Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>
Cc: Moe, Alison (USANYS) <AMoe@usa.doj.gov>; Julia Catania <jcatania@weddlelaw.com>
Subject: RE: Kobach

Justin,

Confirming receipt of this. We'll review and get back to you.

Nick

From: Justin Weddle <jweddle@weddlelaw.com>
Sent: Tuesday, September 22, 2020 11:33 AM
To: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>
Cc: Moe, Alison (USANYS) <AMoe@usa.doj.gov>; Roos, Nicolas (USANYS) <nroos@usa.doj.gov>; Julia Catania <jcatania@weddlelaw.com>
Subject: Re: Kobach

Dear all,

Please see the attached letter. I have also attached the New Jersey subpoena referenced in my letter.

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<[image008.png](#)>
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From: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>
Date: Thursday, September 3, 2020 at 9:11 AM
To: Justin Weddle <jweddle@weddlelaw.com>
Cc: "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>, "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>
Subject: Kobach

Justin,

We understand that you represent Kris Kobach and will accept the following voluntary request on his behalf, which will include any materials within Mr. Kobach's possession, custody, or control (including, but not limited to, the files of his law firm).

For the purposes of our request, we provide the following instructions and definitions:

1. This request is for the production of categories of documents, records, correspondence, and other written and electronic material, as specified below, in your client's possession, custody or control. This request covers all responsive documents wherever they may be found, including on computers, email accounts, iCloud accounts, servers, cellphones, and other personal electronic devices, whether in the United States or any foreign jurisdiction.
2. "Documents" refers to any and all documents and records, in whatever form kept, including, but not limited to, writings, emails, text messages, messages sent through "apps" or social media accounts, drawings, graphs, charts, calendar entries, photographs, audio or visual recordings, images, and other data or data compilations, and includes materials on both paper and electronic form.
3. The term "We Build the Wall" refers to the Section 501(c)(4) organization bearing the name "We Build the Wall Inc." founded in or around January 2019, and includes all of its predecessor or successor organizations and fundraising campaigns, as well as any officers, directors, agents, or employees of those entities.
4. The terms "Freedom Daily LLC," "Media Vines LLC," "White Knights & Vultures LLC," "Stockton Strategies LLC," "Citizens of the American Republic," "Ranch Property Marketing & Management LLC," "Richmond Strategic Advisors," "America First Medical," "Pitch Fork Politics," "Decisive Fiber Group Inc.," and "Big League Politics" each refer to a corporate entity bearing that name and include the entity's officers, directors, agents, or employees.
5. This request does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be specifically identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

We request that your client produce the following materials, for the time period of December 1, 2018 until August 20, 2020:

1. Any and all documents relating to, including communications with or about, We Build the Wall, Freedom Daily LLC, Media Vines LLC, White Knights & Vultures LLC, Stockton Strategies LLC, Citizens of the American Republic, America First Medical,

Ranch Property Marketing & Management LLC, Pitch Fork Politics, Richmond Strategic Advisors, Big League Politics, Brian Kolfage, Stephen Bannon, Andrew Badolato, Timothy Shea, Amanda Shea, Lewis Moon, Daniel Fleurette, Michael Furey, Dustin Stockton, and Jennifer Lawrence.

2. Any and all documents relating to, including communications with or about, the use of We Build the Wall's email or donor lists in connection with your client's campaign for United States Senate, including, but not limited to, any solicitations for contributions.

We would be grateful if you could please confirm receipt, and produce to us the materials responsive to this request by the end of this month.

Thanks,

Rob

Robert B. Sobelman
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One Saint Andrew's Plaza
New York, New York 10007
Tel: (212) 637-2616

From: Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Sent: Monday, August 31, 2020 9:40 PM
To: Justin Weddle <jweddle@weddlelaw.com>
Cc: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>; Moe, Alison (USANYS) <AMoe@usa.doj.gov>
Subject: RE: <no subject>

Hi Justin,

I'm following up on our call from a little over a week ago. Have you worked out who, if anyone, you'll be representing in relation to our case? If you aren't representing Mr. Kobach, can you please share his counsel's contact information?

Thank you,

Nick

Nicolas Roos
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Tel: (212) 637-2421
Cell: (646) 832-5910

From: Justin Weddle <jweddle@weddlelaw.com>
Sent: Friday, August 21, 2020 3:27 PM
To: Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Cc: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>; Moe, Alison (USANYS) <AMoe@usa.doj.gov>
Subject: Re: <no subject>

That's good. Thanks.

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From: "Roos, Nicolas (USANYS)" <Nicolas.Roos@usdoj.gov>
Date: Friday, August 21, 2020 at 3:26 PM
To: Justin Weddle <jweddle@weddlelaw.com>
Cc: "Sobelman, Robert (USANYS)" <Robert.Sobelman@usdoj.gov>, "Moe, Alison (USANYS)" <Alison.Moe@usdoj.gov>
Subject: RE: <no subject>

Justin,

My colleagues are copied on this email. Can we talk at 3:45? Here's my dial in:

Conference call number: Redacted

Passcode: Redacted

Nick

Nicolas Roos
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Tel: (212) 637-2421

From: Justin Weddle <jweddle@weddlelaw.com>
Sent: Friday, August 21, 2020 3:22 PM
To: Roos, Nicolas (USANYS) <nroos@usa.doj.gov>
Subject: <no subject>

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